



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

MARTHA NIMMER
Special Assistant Corporation Counsel
Cell: (917) 499-8632

February 16, 2023 **MEMO ENDORSED**

The Application is granted.

VIA ECF

Hon. Paul G. Gardephe
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: *Feb 17 2023*

Re: *R.M. v. N.Y.C. Dep't of Education*, 21-cv-11210 (PGG)(DCF)

Dear Judge Gardephe:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request that the filing deadline for Defendant's opposition papers, currently set for February 17, 2023, be extended to February 21, 2023. Plaintiff consents to this request. I also request (with Plaintiff's approval) that the deadline for filing reply papers be extended from February 24, 2023 to February 28, 2023. This is the first request for an extension of the opposition and reply papers' filing deadlines. I apologize for the lateness of this request, which is largely due to the fact that I am caring for my sick 7-year old daughter.

Accordingly, the parties respectfully request that the February 17, 2023 deadline for Defendant's opposition papers be extended to February 21, 2023, and the deadline for Plaintiffs' reply papers be extended to February 28, 2023.

Thank you for considering these requests.

Respectfully submitted,

/s/

Martha Nimmer
Special Assistant Corporation Counsel

cc: Benjamin Kopp, Esq. (via ECF)